

## REMARKS

Claims 1-21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Youn (U.S. 5,856,816). Applicants respectfully traverse this rejection because the cited reference does not disclose or suggest a data driver, and all of its plurality of blocks, positioned on a single edge of two opposing edges of a liquid crystal display panel.

In repeating this previous rejection, the Examiner unfairly characterizes what constitutes an “edge” in Youn. The Examiner’s present mischaracterization of this word contradicts both the plain meaning of the word, as well as the Examiner’s own previous interpretation of record. Furthermore, the cited reference also fails to teach or even suggest the features of the present invention according to the Examiners new re-interpretation of the word “edge.”

The United States Court of Appeals for the Federal Circuit has unequivocally held that claim terms are first construed according to the ordinary meaning of the claim term in question. See E-Pass Technologies, Inc., v. 3Com Corp., 343 F.3d 1364, 1367 (Fed. Cir. 2003). The ordinary meaning of the claim term is determined according to the context of its use, and there is a “heavy presumption” that the claim term carries such an ordinary and customary meaning, unless this presumption has been rebutted by the Specification. Id. at 1368. In the present case, however, the Examiner has not interpreted the claim term “edge” according to its ordinary meaning, the context in which it is used, or in light of the Specification to the present Application. The ordinary meaning, the context, and the present Specification are all consistent in this case, and all contradict the Examiner’s new construction of the term.

The claims of the present invention all utilize the term “edge” to refer to the area of external periphery of a flat panel liquid crystal display (“LCD”) device. This construction is entirely consistent with both the ordinary meaning and definition of the term, as well as the context of its use in the present claims. Webster defines an “edge” as a “margin,” a “border,” or a “line or point where a material object or area begins or ends.” Webster’s Third New International Dictionary, 722 (1993) (relevant portions reprinted in Appendix A). Roget’s Thesaurus defines an “edge” as a “fairly narrow line or space forming a boundary,” or a “border, borderline, brim, brink, edging, fringe, margin, periphery, rim, or verge.” Roget’s II; The New Thesaurus, (3d ed. 1995) (Appendix B). In addition to these definitions of the term, American Heritage further defines an “edge” as a “part *away from the middle*,” or “an extremity” The American Heritage Dictionary of the English Language (4<sup>th</sup> ed. 2000) (Appendix C). All of these ordinary definitions of the term “edge” are consistent in the context of use in the present claims, and refer to the area nearest the outer periphery/perimeter/margin of the two flat substrate panels of the LCD device. No other dictionary definition of the term contradicts this construction, nor does the Specification to the present Application.

In spite of this ordinary meaning of the term, the Examiner continues to reject the claims of the present invention based on his own separate, new, and different construction. According to the Examiner (Pg. 2 of Paper No. 5), an “edge” may also be defined to include the entirety of either flat, planar surface of the substrate panels of the LCD device. In other words, the Examiner asserts that an “edge” of an LCD panel may also

include the central surface region of the panel itself. Such an assertion, however, is without support in any of the dictionary definitions provided, or in the cited prior art reference itself.

First, one skilled in the art would not interpret the flat central region of an LCD panel to be its border, margin, perimeter, or part away from the middle of the panel. Just the opposite would be true. One skilled in the art would be even further apprised that the placement of any data driver circuitry within the central region of an LCD panel would render the device essentially useless. The very purpose of an LCD panel is to display an image. Placement of circuitry components in the central region of this panel, however, would directly block large portions of a displayed image from view, and therefore defeat the purpose of the device. Therefore, in addition to contradicting the ordinary definition of the term in question, the Examiner's new interpretation is also unreasonable in light of the fact that it would render the operation of the present invention (as well as the device of the sole cited prior art reference) effectively useless. Accordingly, the Examiner should construe the claim term "edge" according to its ordinary meaning, and withdraw the Section 103 rejection.

Furthermore, the Examiner's new construction of the term "edge" is even more unreasonable in light of the fact that it directly contradicts the Examiner's previous construction of the term in Paper No. 24. The Examiner specifically defined the "top-edge" of the prior art panel consistently with the ordinary meaning, to refer to only the uppermost borderline of the panel 1 along the driver 2a, and the "bottom-edge" of the panel 1 to be the lower most borderline of the panel 1 along the driver 2b opposite to the uppermost borderline. (Pg. 8 of Paper No. 24; Fig. 2 of Youn). The Examiner even went so far as to "additionally note that the top and bottom edges comprise two separate and distinct edges of

the LCD panel.” These previous constructions by the Examiner were consistent with the ordinary meaning and usage of the term, and are now directly contradicted by the Examiner’s newly-asserted construction that departs from the ordinary meaning. Accordingly, for at least these additional reasons, the Examiner should restore his original construction according to the ordinary meaning of the term, and withdraw this section 103 rejection.

Additionally, and for the purposes of this discussion only, even if the main, flat, central surface region of Youn’s panel 1 could be considered an “edge” by some interpretation, nowhere does Youn teach or even suggest that the drivers 2a, 2b are located on one such flat surface. First, the only cited drawing from Youn (Fig. 2) is a two-dimensional, top-view schematic only, and one which does not teach or suggest any placement of either driver 2a, 2b in relation to one flat surface or the other. In fact, Youn does not show any three-dimensional, or side, view depicting such top or bottom opposing surfaces. Section 2143.03 of the MPEP requires that every feature and limitation of a recited claim must be clearly taught or suggested in the prior art. In the present case, however, the Examiner has not met this burden, because he has not demonstrated how Youn could teach or suggest that its drivers 2a, 2b are located on only one of its top or bottom surfaces. Accordingly, for these still further reasons, the obviousness rejection must be withdrawn.

Second, Youn does not even show either of the two drivers 2a, 2b on either surface of the panel 1. Claim 1 of the present invention, on the other hand, specifically recites, among other things, that the driver is “on a single edge of the two opposing edges” of the LCD panel. Fig. 2 of Youn, however, shows just the opposite configuration. Fig. 2 of Youn specifically shows the drivers 2a, 2b to be *away* from the flat surface of the panel 1.

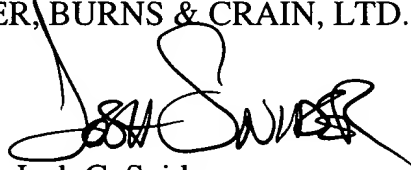
No reasonable reading of Fig. 2 of Youn could locate either driver 2a, 2b on the flat surface portion of the panel 1, as would be required by the present invention. Any further assertion by the Examiner that the drivers could somehow be located "on" the central surface region of the panel (the display region) would, as discussed above, render the device effectively useless. Therefore, even if the Examiner's new construction of the term "edge" could be considered reasonable, the Youn reference here clearly teaches away from the present invention under such a construction. Accordingly, because an obviousness rejection cannot be based upon a reference which teaches away from the present claimed invention, the section 103 rejection must be withdrawn for these reasons as well.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1-21, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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